

1 ANTHONY M. BARNES, SBN 199048
Email: amb@atalawgroup.com
2 JASON R. FLANDERS, SBN 238007
Email: jrf@atalawgroup.com
3 AQUA TERRA AERIS (ATA) LAW GROUP
4 4030 Martin Luther King Jr. Way
Oakland, CA 94609
5 Telephone: (917) 371-8293

6 Attorney for Plaintiffs
7 CALIFORNIA SPORTFISHING PROTECTION ALLIANCE

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 CALIFORNIA SPORTFISHING PROTECTION
11 ALLIANCE, a nonprofit corporation,

12 Plaintiff,

13 vs.

14 STERICYCLE, INC., a Delaware corporation,

15 Defendant.
16
17
18
19
20
21
22
23
24
25
26
27
28

Case No.: 5:20-cv-08435-VKD

**NOTICE OF LODGING OF [PROPOSED]
SETTLEMENT AGREEMENT;
REQUEST FOR ENTRY OF
[PROPOSED] SETTLEMENT
AGREEMENT**

1 WHEREAS, on April 29, 2021, California Sportfishing Protection Alliance (“Plaintiff”) and
 2 Defendant Stericycle, Inc. (“Defendant”) (collectively, “the Parties”) agreed on a tentative settlement
 3 resolving the issues raised in Plaintiffs’ complaint; and

4 WHEREAS, on April 29, 2021, Plaintiffs filed a Notice of Tentative Settlement and requested
 5 the Court not sign the Settlement agreement until a mandatory period for comment by the United
 6 States had passed pursuant to United States Code, title 33, section 1365(c)(3) and Code of Federal
 7 Regulations, title 40, section 135.5 (ECF #17); and

8 WHEREAS, on April 30, 2021, Plaintiff filed a Notice of Commencement of 45-Day Review
 9 Period, which advised the Court that the United States had acknowledged receipt of the Settlement
 10 Agreement and would notify the Court of any objections to the Settlement Agreement by June 14,
 11 2021, (ECF #18); and

12 WHEREAS, on June 9, 2021, the United States Department of Justice notified Plaintiff via
 13 electronic mail that the United States does not object to the Court’s entry of the Settlement Agreement
 14 into judgment; as the Agencies have indicated that they have no objection to entry, the Court may
 15 now enter the [Proposed] Settlement Agreement, which includes a request that the Court retain
 16 jurisdiction to enforce the terms of the [Proposed] Settlement Agreement if necessary.

17 WHEREAS, on June 16, 2021, Plaintiff submitted a [Proposed] Settlement Agreement to the
 18 Court for approval and entry.

19 THEREFORE, Plaintiff hereby requests the Court sign the [Proposed] Settlement Agreement,
 20 a true and correct copy of which is attached to this Notice of Lodging as “Exhibit A,” and enter the
 21 Settlement Agreement as judgment.

22
 23 DATED: 6/16/2021

s/Anthony M. Barnes
 Anthony M. Barnes
 Attorneys for Plaintiff